

EMS Corrective Action Report (CAR)

Facility Name: EPA Region III

Activity Number: 1

Audit Date: May 19, 2003

Finding Number: 6 - EMS perceived as an environmental improvement program only.

Category: A/B

Root Cause Analysis:

Focus of EMS activities, training and publicity has been on the environmental aspects of the Regional office. More effort is needed to integrate the management elements of the EMS into the structure of the EMS.

Interim Actions:

Put equal emphasis on the Management elements as the Environmental improvements of the EMS.

Corrective Actions:

Establish EMS element "champions" from the EMS Integration team. Each champion would be responsible for a specific core element of the EMS. Committees would be established to ensure that each core element is integrated into the regional activities.

Preventive Actions:

None

Action Due Date: June 15, 2003

EMS Coordinator:

Environmental Manager Approval:

Date Closed:

EMS Auditor Verification:

Date:

EMS Corrective Action Report (CAR)

Facility Name: EPA Region III

Activity Number: 1

Audit Date: May 19, 2003

Finding Number: 7 - Legal review focus on environmental improvement goals versus Regional compliance

Category: A

Root Cause Analysis:

EMS procedures do not document adequately the process used to identify Region III's compliance requirements with environmental, health and safety laws, Executive Orders, and other applicable requirements. In the past, OPM has "looked into" these issues and identified the compliance requirements on an ad hoc basis. An acceptable formal documentation does not exist.

Interim Actions:

Convene workgroup to identify the legal requirements and responsible parties and establish written procedures.

Corrective Actions:

Make the responsibility to identify legal and other requirements the responsibility of an EMS committee, headed by a "champion." Make the EHS Manager a member of the EMS Integration team.

Preventive Actions:

Action Due Date: June 30, 2003

EMS Coordinator:

Environmental Manager Approval:

Date Closed:

EMS Auditor Verification:

Date:

EMS Corrective Action Report (CAR)

Facility Name: EPA Region III

Activity Number: 1

Audit Date: May 19, 2003

Finding Number: 8 - EMS Development Team meeting attendance improvements needed

Category: A

Root Cause Analysis:

Attendance at the EMS Development Team meetings has not included all of the members. Often, less than half of the membership attends, even though "scheduler" is used to identify times when team members are available. The nature of the development work has made these meetings sporadic.

Interim Actions:

Establish a "once a month" schedule for EMS Integration Team meetings. Obtain input on the day which is convenient to all the members.

Corrective Actions:

Have each Division/Office reaffirm the team participant and an alternate for the EMS Integration team.

Preventive Actions:

Send a meeting reminder with the draft agenda to the team members one week before the meeting.
Send meeting minutes to the team members within a week of the meeting.

Action Due Date: June 4, 2003

EMS Coordinator:

Environmental Manager Approval:

Date Closed:

EMS Auditor Verification:

Date:

EMS Corrective Action Report (CAR)

Facility Name: EPA Region III

Activity Number: 1

Audit Date: May 19, 2003

Finding Number: 9 - Continuing evidence of top management commitment needed

Category: A

Root Cause Analysis:

Demonstration of commitment by management is needed beyond signed policy to insure EMS becomes permanent. Past management initiatives have been unsuccessful because of a lack of continued senior management support. EMS is viewed as a add-on program.

Interim Actions:

Deputy Regional Administrator (DRA) becomes the advocate for the EMS. DRA's Special Assistant chairs the EMS Integration Team meetings.

Corrective Actions:

DRA includes EMS activities in his report-out during senior management meetings on at least a monthly basis. Deputy Director of the Environmental Assessment and Innovations Division reports on EMS activities at the monthly Deputy Division Directors meetings.

Preventive Actions:

EMS coordinator promotes EMS activities and senior management support through various inreach techniques including e-mails and salients.

Action Due Date: June 2, 2003

EMS Coordinator:

Environmental Manager Approval:

Date Closed:

EMS Auditor Verification:

Date:

EMS Corrective Action Report (CAR)

Facility Name: EPA Region III

Activity Number: 1

Audit Date: May 19, 2003

Finding Number: 10 - EMS not yet part of operations

Category: A

Root Cause Analysis:

EMS framework is not part of the routine operations of the Regional office. Organization of the significant aspect workplans and EMS Development team established along divisional responsibilities instead of by EMS core element.

Interim Actions:

Establish EMS core element "champions" from the EMS Integration team.

Corrective Actions:

Revise the significant aspect workplans to include the core elements.

Preventive Actions:

Action Due Date: July 1, 2003

EMS Coordinator:

Environmental Manager Approval:

Date Closed:

EMS Auditor Verification:

Date:

EMS Corrective Action Report (CAR)

Facility Name: EPA Region III

Activity Number: 1

Audit Date: May 19, 2003

Finding Number: 11 - EMS perceived as an add-on program.

Category: A

Root Cause Analysis:

EMS team responsibilities often do not take precedent over core program responsibilities. EMS team responsibilities are not included in position descriptions, critical job elements or performance standards.

Interim Actions:

Reaffirmation of EMS by senior management to indicate importance and long-term aspect of EMS.

Corrective Actions:

Include EMS responsibilities in the position descriptions, critical job elements or performance standards of the EMS Integration and Significant Aspect workgroup members.

Preventive Actions:

Action Due Date: August 1, 2003

EMS Coordinator:

Environmental Manager Approval:

Date Closed:

EMS Auditor Verification:

Date:

EMS Corrective Action Report (CAR)

Facility Name: EPA Region III

Activity Number: 1

Audit Date: May 19, 2003

Finding Number: 12 - Employees not aware of EMS policy

Category: B

Root Cause Analysis:

Some employees have not taken the EMS awareness training or do not remember taking it. The EMS policy was presented and discussed in the training.

Interim Actions:

Display the complete EMS policy on poster size in the lobby area, on the 4th floor vending area, and on the 16th floor reception area.

Corrective Actions:

Place additional emphasis on the EMS policy in the updated version of the EMS awareness training.

Add a test mechanism to both the interactive and on-line versions. Use the training database to identify employees who have not taken either training and contact their senior manager to encourage them to take the on-line version.

Preventive Actions:

Action Due Date: July 31, 2003

EMS Coordinator:

Environmental Manager Approval:

Date Closed:

EMS Auditor Verification:

Date:

EMS Corrective Action Report (CAR)

Facility Name: EPA Region III

Activity Number: 1

Audit Date: May 19, 2003

Finding Number: 13 - Performance tracking tools needed

Category: B

Root Cause Analysis:

No mechanism to track and display the Region's progress in achieving objectives and targets exists.

Interim Actions:

Hire a NNEMS student to develop performance tracking tools for the objectives and targets.

Corrective Actions:

Establish routine update schedule for all performance tracking tools.

Preventive Actions:

Action Due Date: June 30, 2003

EMS Coordinator:

Environmental Manager Approval:

Date Closed:

EMS Auditor Verification:

Date:

EMS Corrective Action Report (CAR)

Facility Name: EPA Region III

Activity Number: 1

Audit Date: May 19, 2003

Finding Number: 14 - EMS team training needs improvement

Category: B

Root Cause Analysis:

Introductory training videoconference and subsequent videotape (Awareness Training, EMS, Preparing for ISO EMS Implementation) was too long and not always relevant to EPA development of an EMS.

Interim Actions:

Stop using videotape as a training tool for EMS Integration team.

Corrective Actions:

Use 4-Module EMS training materials for EMS Integration team.

Preventive Actions:

Action Due Date: May 30, 2003

EMS Coordinator:

Environmental Manager Approval:

Date Closed:

EMS Auditor Verification:

Date:

EMS Corrective Action Report (CAR)

Facility Name: EPA Region III

Activity Number: 1

Audit Date: May 19, 2003

Finding Number: 15 - Employee Awareness Training effectiveness improvements needed.

Category: B

Root Cause Analysis:

Employees did not retain information from EMS Awareness training.

Interim Actions:

Add a test mechanism to the EMS Awareness Training (interactive and on-line versions)

Corrective Actions:

Require all employees to take the EMS Awareness training as a refresher annually.

Preventive Actions:

Action Due Date: August 31, 2003

EMS Coordinator:

Environmental Manager Approval:

Date Closed:

EMS Auditor Verification:

Date:

EMS Corrective Action Report (CAR)

Facility Name: EPA Region III

Activity Number: 1

Audit Date: May 19, 2003

Finding Number: 16 - Budget constraints delay EMS improvement ideas

Category: B

Root Cause Analysis:

Budget cuts may make it difficult to fund EMS improvement activities, such as purchase of computer software which would improve the tracking of printer and paper use.

Interim Actions:

Corrective Actions:

Recommend, if funding becomes available, that EMS related improvements be given a high priority consideration.

Preventive Actions:

Establish a policy that the Region will use cost savings from EMS activities to fund additional EMS projects.

Action Due Date: July 1, 2003

EMS Coordinator:

Environmental Manager Approval:

Date Closed:

EMS Auditor Verification:

Date:

EMS Corrective Action Report (CAR)

Facility Name: EPA Region III

Activity Number: 1

Audit Date: May 19, 2003

Finding Number: 17 - Extension of EMS to contractors, suppliers, etc needed

Category: B

Root Cause Analysis:

Contractors and suppliers are required to follow the Federal Acquisition Requirements. There is no mention of EMS in these requirements.

Interim Actions:

Corrective Actions:

Include EMS as a requirement under the Federal Acquisition Requirements.

Preventive Actions:

Action Due Date: Requires HQ action

EMS Coordinator:

Environmental Manager Approval:

Date Closed:

EMS Auditor Verification:

Date:

EMS Corrective Action Report (CAR)

Facility Name: EPA Region III

Activity Number: 1

Audit Date: May 19, 2003

Finding Number: 18 - Authority needed to emphasize expectations

Category: B

Root Cause Analysis:

Some EMS Development team members have had limited participation due to core program responsibilities.

Interim Actions:

Establish the Deputy Regional Administrator as the EMS Advocate.

Corrective Actions:

Preventive Actions:

Action Due Date: June 2, 2003

EMS Coordinator:

Environmental Manager Approval:

Date Closed:

EMS Auditor Verification:

Date:

EMS Corrective Action Report (CAR)

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Activity Number: 1

Audit Date: May 19, 2003

Finding Number: 19 - Interested parties not identified or proactively included

Category: B

Root Cause Analysis:

The identification of Aspects was done using input from Regional staff and based on the efforts of the ESC - Ft. Meade. No interested parties were contacted and input received in developing the list of aspects.

Interim Actions:

Establish a suggestion box and contact us feature on the Region III EMS web-site.

Corrective Actions:

Preventive Actions:

Seek input from interested parties, (States, building management and tenants, etc.), for future aspect development.

Action Due Date: June 2, 2003

EMS Coordinator:

Environmental Manager Approval:

Date Closed:

EMS Auditor Verification:

Date: